

Howard S. Koh  
*Partner*  
Direct (212) 655-3587  
Fax (646) 539-3587  
[hsk@msf-law.com](mailto:hsk@msf-law.com)

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**BY CM/ECF**

Honorable Dora L. Irizarry, U.S.D.J.  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: ***McDonald's Corp. v. Vanderbilt Atlantic Holdings LLC, No. 19-cv-6471***

Dear Judge Irizarry:

We are counsel to Defendant and write, pursuant to the Court's Order of March 24, 2022 and with the consent of Plaintiff, to submit a proposed briefing schedule with respect to Defendant's motion for summary judgment. The parties propose as follows:

- Defendant shall serve its moving papers on or before April 29, 2022
- Plaintiff shall serve its opposing papers on or before June 10, 2022
- Defendant shall serve its reply papers on or before Jun 24, 2022
- Defendant shall file all motion papers via ECF and deliver courtesy copies to the Court in accordance with its Individual Motion Practice Rules on or before June 27, 2022.

We respectfully request the Court So Order this proposed briefing schedule.

Respectfully submitted,

*S/ Howard S. Koh*

Howard S. Koh

cc: All counsel of record by CM/ECF